

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION

JEREMY ROTHE-KUSHEL,)	
Lawrence, Kansas,)	
)	
Plaintiff,)	
)	
v.)	Case No. 4:18-cv-319-BP
)	
JEWISH COMMUNITY FOUNDATION)	
UnOF GREATER KANSAS CITY, et al.,)	
)	
Defendants.)	

**MOTION FOR LEAVE TO FILE CONSOLIDATED RESPONSE TO ALL PENDING
MOTIONS TO DISMISS, TO EXCEED PAGE LIMIT, AND
FOR AN EXTENSION OF FOUR DAYS TO FILE RESPONSE**

COMES NOW Plaintiff Jeremy Rothe-Kushel, by counsel, with the consent of Defendants Jewish Community Foundation of Greater Kansas City, Lauren Hoopes, Joshua Stein, and Kim Rausch¹, and hereby moves for leave to file a consolidated response to all pending motions to dismiss, to exceed the customary page limit, and for an extension of time to and including Friday, August 10, 2018, within which to respond to the five motions to dismiss filed by those defendants and now pending before the Court. As explained in the suggestions in support of this motion, filed herewith and herein incorporated by reference, there are good reasons to grant the requested relief and, accordingly, Plaintiff's motion should be granted.

¹Undersigned counsel for Plaintiff also sought the consent of Defendant Blair Hawkins, but as of the time of filing this motion, has not received a response.

Respectfully submitted,

ARTHUR BENSON & ASSOCIATES

By s/ Jamie Kathryn Lansford
Arthur A. Benson II Mo. Bar No. 21107
Jamie Kathryn Lansford Mo. Bar No. 31133
4006 Central Avenue
Kansas City, Missouri 64111
(816) 531-6565
abenson@bensonlaw.com
jlansford@bensonlaw.com

and

LAW OFFICE OF FRED SLOUGH

By s/ Fred L. Slough
Fred L. Slough #23915
2800 City Center Square, 1100 Main Street
Kansas City, Missouri 64105
(816) 309-2644
(816) 472-6009 (telefacsimile)
fred@fredslough.com

Attorneys for Plaintiff Rothe-Kushel

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing was filed on and served via the Court's electronic filing system on counsel listed below this 3rd day of August, 2018:

Diane Peters Mo. Bar. No. 54784
Whitney Fay Mo. Bar. No. 68061
Assistant Attorneys General
Joshua D. Hawley, Attorney General of Missouri
615 E. 13th Street, Suite 401
Kansas City, Missouri 64106
(816) 889-5000

(816) 889-4006 (telefacsimile)
Diane.Peters@ago.mo.gov
Whitney.Fay@ago.mo.gov

Attorneys for Defendants Leland Shurin, Nathan Garrett,
Mark Tolbert, Don Wagner, Mayor Sylvester James,
Chief Richard Smith, Michael Satter, Brent Parsons,
and Michael Curley

and

John Schultz Mo Bar No. 34711
Jacqueline Cook Mo Bar No. 36389
Franke Schultz & Mullen, P.C.
8900 Ward Parkway
Kansas City, Missouri 64114
(816) 421-7100
(816) 421-7915 (telefacsimile)
jschultz@fsmllawfirm.com
jcook@fsmllawfirm.com

Attorney for Defendant Kim Rausch

and

Louis A. Huber III Mo. Bar No. 28447
Daniel R. Young Mo. Bar No. 34742
Michael P. Schaefer Mo. Bar No. 59308
Schlee & McCarthy, P.C.
4050 Pennsylvania, Suite 300
P.O. Box 32430 (zip: 64171-54630)
Kansas City, Missouri 64111
(816) 931-3500
(816) 931-3553 (telefacsimile)
lhuber@schleelaw.com
dyoung@schleelaw.com
mschaefer@schleelaw.com

Attorneys for Defendants Jewish Community
Foundation of Greater Kansas City, Lauren Hoopes,
and Joshua Stein

and

James C. Morrow Mo. Bar No. 32658
Claudio E. Molteni Mo. Bar No. 38671
Morrow Willnauer Church LLC
8330 Ward Parkway, Suite 300
Kansas City, Missouri 64114
(816) 382-1382
(816) 382-1383 (telefacsimile)
jmorrow@mwcattorneys.com
cmolteni@mwcattorneys.com

Attorney for Blair Hawkins

s/ Jamie Kathryn Lansford
Attorney for Plaintiff Jeremy Rothe-Kushel